EXHIBIT 77

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

_____

RICHARD KADREY, et al.,   )

)

        Individual and   )

        Representative   )

        Plaintiffs,   )

)

v.   )   Case No. 3:23-cv-03417-VC

)

META PLATFORMS, INC.,   )

)

        Defendant.   )

_____)

    ** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY **

        Videotaped Deposition of SEAN BELL

            San Francisco, California

           Wednesday, December 11, 2024

            Reported Stenographically by

    Michael P. Hensley, RDR, CSR No. 14114

_____

            DIGITAL EVIDENCE GROUP

        1730 M. Street, NW, Suite 812

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 1   experiments on the issue, my question is whether you

 2   have an opinion on whether a collection of documents

 3   would have the same training value for long-range

 4   context modeling as books.

 5              ATTORNEY HARTNETT:  Objection to the form.

 6   Asked and answered.

 7              THE WITNESS:  The problem is how -- like,

 8   how are you using the LLM?  So that's the problem.

 9              So, for example, if my use of the LLM is

10   to do coding and what I want to do is input my code

11   repository, that tends to be a collection of little

12   files; and so in that way that means that I would

13   want to train the model to match how I'm actually

14   using it.

15              So if I were, for example, focusing

16   just -- let's say I wanted to use an LLM to write a

17   book for me; then I think in that case my intuition

18   would be that obviously I want to train on a bunch

19   of books, like a bunch of other things, and probably

20   I'd want to have a very large proportion of books.

21              You know, but what we find is people are

22   using LLMs for all kinds of things, and quite a lot
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1   CERTIFICATE OF SHORTHAND REPORTER

2

3   I, Michael P. Hensley, Registered Diplomate

4   Reporter for the State of California, CSR No. 14114,

5   the officer before whom the foregoing deposition was

6   taken, do hereby certify that the foregoing

7   transcript is a true and correct record of the

8   testimony given; that said testimony was taken by me

9   stenographically and thereafter reduced to

10   typewriting under my direction; that reading and

11   signing was not requested; and that I am neither

12   counsel for, related to, nor employed by any of the

13   parties to this case and have no interest, financial

14   or otherwise, in its outcome.

15

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19   Michael P. Hensley, CSR, RDR

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